

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment Trust 2007-1

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 DEUTSCHE BANK NATIONAL TRUST
12 COMPANY, AS INDENTURE TRUSTEE
13 FOR AMERICAN HOME MORTGAGE
14 INVESTMENT TRUST 2007-1,

15 Plaintiff,

16 vs.

17 OLD REPUBLIC TITLE INSURANCE
18 GROUP, INC.; OLD REPUBLIC NATIONAL
19 TITLE INSURANCE COMPANY;
20 FOUNDERS TITLE COMPANY OF
21 NEVADA; DOE INDIVIDUALS I through X;
and ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 3:20-cv-00535-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF No.
13]**

[Third Request]

22 Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee for American
23 Home Mortgage Investment Trust 2007-1 (“Deutsche Bank”) and Defendant Old Republic
24 National Title Insurance Company (“ORNTIC”) (collectively, the “Parties”), by and through
25 their counsel of record, hereby stipulate and agree as follows:

- 26 1. On September 10, 2020, Deutsche Bank filed its Complaint in Second Judicial
27 District Court, Case No. CV20-01413 [ECF No. 1-1];

2. On September 22, 2020, ORNTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On November 3, 2020, ORNTIC filed a Motion to Dismiss [ECF No. 13]
4. Deutsche Bank's deadline to respond to ORNTIC's Motion to Dismiss is currently December 15, 2020;
5. Deutsche Bank's counsel is requesting an extension until Wednesday, December 23, 2020, to file its response to the pending Motion to Dismiss;
6. This extension is requested as Deutsche Bank recently realized that it inadvertently attached an incorrect exhibit to its Complaint. The Parties are currently discussing the best course to correct the exhibit, which may have an impact on the pending Motion to Dismiss.
7. Counsel for ORNTIC does not oppose the requested extension;
8. This is the third request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 15th day of December, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

Darren T. Brenner, Esq.

Nevada Bar No. 8386

Lindsay D. Robbins, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff, Deutsche Bank

National Trust Company, as Indenture

Trustee for American Home Mortgage

Investment Trust 2007-1

DATED this 15th day of December, 2020.

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

/s/ Sophia S. Lau

Scott E. Gizer, Esq.

Nevada Bar No. 12216

Sophia S. Lau, Esq.,

Nevada Bar No. 13365

8716 Spanish Ridge Avenue, Suite 105

Las Vegas, Nevada 89148

Attorneys for Defendant, Old Republic

National Title Insurance Company and Old

Republic Title Insurance Group, Inc.

IT IS SO ORDERED.

Dated this 16th day of December, 2020.



UNITED STATES DISTRICT JUDGE